

*Tiki Brown*  
 Tiki Brown  
 Clerk of State Court  
 Clayton County, Georgia  
 Latasha Currie

IN THE STATE COURT OF CLAYTON COUNTY  
 STATE OF GEORGIA

MICA BULLOCK,	)	
	)	
Plaintiff,	)	
	)	
v.	)	
	)	CIVIL ACTION FILE
BRADFORD RIDGE OWNER, LLC,	)	No. 2023CV00170
BRADFORD RIDGE HOLDINGS, LLC,	)	
RADCO RESIDENTIAL, LLC,	)	
JOHN DOE OWNER 1,	)	
JOHN DOE PROPERTY MANAGER 2,	)	
JOHN DOE SECURITY PROVIDER 3,	)	
	)	
Defendants.	)	
	)	

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**ANSWER OF RADCO RESIDENTIAL, LLC**

Now COMES Radco Residential, LLC, a party named as a defendant in the above-captioned lawsuit (“Radco” or “Defendant”), by and through its attorneys, and hereby submits its Answer to Plaintiff’s Complaint For Damages (“Complaint”) in this matter and respectfully shows this Court as follows.

**DEFENSES**

As of the preparation of this Answer, Radco lacks knowledge as to all the facts and circumstances surrounding Plaintiff’s claims. The following defenses and responses are asserted, and will be relied upon, to the extent that discovery, investigation, and applicable law show such defenses and responses to be appropriate. This Answer may be amended and/or supplemented with amended or additional defenses and responses.

**FIRST DEFENSE**

Radco did not become involved in managing the property at issue until February, 2022,

and as a result, Radco does not have knowledge or information sufficient to form a belief as to the truth or falsity of many allegations set forth in the Complaint.

**SECOND DEFENSE**

Radco is not an appropriate entity to be named as a defendant in this lawsuit, in that Radco did not become involved in managing the property at issue until February, 2022.

**THIRD DEFENSE**

To the extent Radco's conduct is relevant, individuals and entities associated with Radco fulfilled any and all legal duties and met any and all standards of care.

**FOURTH DEFENSE**

Plaintiff's alleged injuries were not proximately caused by or contributed to by any intentional or negligent acts or omissions by individuals or entities associated with Radco.

**FIFTH DEFENSE**

Plaintiff's alleged injuries were caused by or contributed to by the acts or omissions of parties other than Radco.

**SIXTH DEFENSE**

The imposition of damages or punitive damages is not appropriate in this matter as against Radco.

**SEVENTH DEFENSE**

Subject to the defenses set forth above, and without waiving them, Radco hereby responds in order to the numbered paragraphs set forth in the Complaint as follows:

**ALLEGED PARTIES**

1.

Radco is without knowledge or information sufficient to form a belief as to the truth or

falsity of the allegations set forth in Paragraph 1 of the Complaint.

2.

Upon information and belief, Radco admits the allegations set forth in Paragraph 2 of the Complaint (except that Bradford Ridge Owner, LLC is a limited liability company as opposed to a corporation).

3.

Upon information and belief, Radco admits the allegations set forth in Paragraph 3 of the Complaint.

4.

Radco is without knowledge or information sufficient to form a belief as to the truth or falsity of the allegations set forth in Paragraph 4 of the Complaint.

5.

Upon information and belief, Radco admits the allegations set forth in Paragraph 5 of the Complaint (except that Bradford Ridge Holdings, LLC is a limited liability company as opposed to a corporation).

6.

Upon information and belief, Radco admits the allegations set forth in Paragraph 6 of the Complaint.

7.

Radco is without knowledge or information sufficient to form a belief as to the truth or falsity of the allegations set forth in Paragraph 7 of the Complaint.

8.

Subject to the specific defense that Radco is not an appropriate entity to be named as a

defendant in this lawsuit, Radco admits the allegations set forth in Paragraph 8 of the Complaint (except that Radco is a limited liability company as opposed to a corporation).

9.

Subject to the specific defense that Radco is not an appropriate entity to be named as a defendant in this lawsuit, Radco admits the allegations set forth in Paragraph 9 of the Complaint.

10.

Radco denies the allegations set forth in Paragraph 10 of the Complaint.

11.

Radco denies the allegations set forth in Paragraph 11 of the Complaint.

#### FACTUAL ALLEGATIONS

12.

Radco denies the allegations set forth in Paragraph 12 of the Complaint.

13.

Radco denies the allegations set forth in Paragraph 13 of the Complaint.

14.

Radco denies the allegations set forth in Paragraph 14 of the Complaint.

15.

Radco denies the allegations set forth in Paragraph 15 of the Complaint.

16.

Radco is without knowledge or information sufficient to form a belief as to the truth or falsity of the allegations set forth in Paragraph 16 of the Complaint.

17.

Radco is without knowledge or information sufficient to form a belief as to the truth or

falsity of the allegations set forth in Paragraph 17 of the Complaint.

18.

Radco is without knowledge or information sufficient to form a belief as to the truth or falsity of the allegations set forth in Paragraph 18 of the Complaint.

19.

Radco is without knowledge or information sufficient to form a belief as to the truth or falsity of the allegations set forth in Paragraph 19 of the Complaint.

20.

Radco is without knowledge or information sufficient to form a belief as to the truth or falsity of the allegations set forth in Paragraph 20 of the Complaint.

21.

Radco is without knowledge or information sufficient to form a belief as to the truth or falsity of the allegations set forth in Paragraph 21 of the Complaint.

22.

Radco is without knowledge or information sufficient to form a belief as to the truth or falsity of the allegations set forth in Paragraph 22 of the Complaint.

23.

Radco is without knowledge or information sufficient to form a belief as to the truth or falsity of the allegations set forth in Paragraph 23 of the Complaint.

24.

Radco is without knowledge or information sufficient to form a belief as to the truth or falsity of the allegations set forth in Paragraph 24 of the Complaint.

COUNT I

25.

Radco restates and incorporates by reference, as if set forth verbatim herein, the responses contained in Paragraphs 1 through 24 above.

26.

Radco denies the allegations set forth in Paragraph 26 of the Complaint.

27.

Radco denies the allegations set forth in Paragraph 27 of the Complaint.

28.

Radco denies the allegations set forth in Paragraph 28 of the Complaint.

29.

Radco denies the allegations set forth in Paragraph 29 of the Complaint.

30.

Radco denies the allegations set forth in Paragraph 30 of the Complaint.

31.

Radco denies the allegations set forth in Paragraph 31 of the Complaint.

32.

Radco denies the allegations set forth in Paragraph 32 of the Complaint.

33.

Radco denies the allegations set forth in Paragraph 33 of the Complaint.

34.

Radco denies the allegations set forth in Paragraph 34 of the Complaint.

35.

Radco denies the allegations set forth in Paragraph 35 of the Complaint.

36.

Radco denies the allegations set forth in Paragraph 36 of the Complaint.

37.

Radco denies the allegations set forth in Paragraph 37 of the Complaint.

38.

Radco denies the allegations set forth in Paragraph 38 of the Complaint and in all subparagraphs thereof.

39.

Radco denies the allegations set forth in Paragraph 39 of the Complaint.

40.

Radco denies the allegations set forth in Paragraph 40 of the Complaint.

41.

Radco denies the allegations set forth in Paragraph 41 of the Complaint.

**COUNT II**

42.

Radco restates and incorporates by reference, as if set forth verbatim herein, the responses contained in Paragraphs 1 through 41 above.

43.

Radco denies the allegations set forth in Paragraph 43 of the Complaint.

44.

Radco denies the allegations set forth in Paragraph 44 of the Complaint.

COUNT III

45.

Radco restates and incorporates by reference, as if set forth verbatim herein, the responses contained in Paragraphs 1 through 44 above.

46.

Radco denies the allegations set forth in Paragraph 46 of the Complaint.

47.

Radco denies the allegations set forth in Paragraph 47 of the Complaint.

EIGHTH DEFENSE

Radco denies any and all allegations and prayers for relief set forth in the WHEREFORE paragraph and in all subparagraphs thereof.

NINTH DEFENSE

To the extent they are not expressly admitted, the allegations set forth in the Complaint are hereby denied.

WHEREFORE, Defendant Radco Residential, LLC respectfully requests as follows:

- (a) That the Complaint be dismissed in its entirety as against Radco;
- (b) That Radco receive a Judgment in its favor and against Plaintiff;
- (c) That any and all relief requested by Plaintiff in the Complaint be denied as against Radco;
- (d) That Radco be awarded the attorney's fees and expenses of litigation incurred in defending itself in this action, pursuant to any applicable provision of law; and

(e) That Radco receive such other and further relief as the Court may deem legal, equitable, and just.

Respectfully submitted this 21<sup>st</sup> day of February, 2023.

/s/ Kevin Quirk  
KEVIN QUIRK  
Georgia State Bar No. 591458  
Attorney for Defendant Radco Residential, LLC

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JOHN DOE PROPERTY MANAGER 2,	)	
JOHN DOE SECURITY PROVIDER 3,	)	
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Defendants.	)	
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have electronically filed the foregoing **Answer Of Radco Residential, LLC** with the State Court of Clayton County by using the Odyssey eFile GA system. I further certify that the following parties or counsel of record are registered as Odyssey eFile GA Filers and that they will be served by the Odyssey eFile GA system:

Daniel Adamson, Esq.  
S.K. Rod Dixon, Esq.  
The Dixon Firm, P.C.  
The Waterstone  
4751 Best Road, Suite 272  
Atlanta, Georgia 30337

This 21<sup>st</sup> day of February, 2023.

/s/ Kevin Quirk \_\_\_\_\_  
KEVIN QUIRK  
Georgia State Bar No. 591458  
Attorney for Defendant Radco Residential, LLC

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